

From: [Michael PINTO](#)
To: [Bury, Carolyn](#)
Subject: Arkema East Plant
Date: Thursday, August 15, 2013 2:45:58 PM
Attachments: [May June 2013.pdf](#)

Carolyn,

I got my bi-monthly timing messed up and neglected to send you the May-June report last month. Attached is the report. I will send the July-August report in September to get us back on schedule. I apologize for my oversight.

On another note, we submitted a revised Trenton Channel FFS to GLNPO last week. We produced the document on behalf of GLNPO since they no longer have a contractor on board. I think we addressed all the RCRA concerns that were communicated to us by GLNPO. GLNPO actually made most of the changes in draft form. We provided some minor input and finalized the text and revised figures. I assume you will review the revised version. If RCRA finds this version acceptable I expect we will resume work on an GLLA RD agreement as soon as possible. Feel free to call me if there is anything you would like to discuss or if there is anything we can do to help the process along.

Michael Pinto
RETIA USA LLC/Legacy Site Services LLC
468 Thomas Jones Way, Suite 150
Exton, PA 19341
Office: 610 594-4435
Fax: 610 594-4439



***** ATTACHMENT NOT DELIVERED *****

This Email message contained an attachment named image001.jpg which may be a computer program. This attached computer program could contain a computer virus which could cause harm to EPA's computers, network, and data. The attachment has been deleted.

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***** ATTACHMENT NOT DELIVERED *****



August 15, 2013

via overnight courier

United States Environmental Protection Agency
Region V
RCRA Enforcement Branch (HRE-8J)
77 Jackson Street
Chicago, IL 60604
Attention: Carolyn Bury, Project Coordinator

Subject: Administrative Order
Docket No. V-W-89R-45
Arkema Inc.
Riverview, Michigan
MID 005 363114
Progress Report #140

Dear Ms. Bury:

In accordance with Task IV, Subtask B of Attachment IV to the above-referenced Administrative Consent Order (ACO), this letter will serve as the Bi-monthly Progress Report covering corrective action activities for the East Plant during the period of May and June 2013. A bi-monthly progress report for activities at the West Plant and West Brine Field will be submitted under separate cover by Mr. Bob Wright of Arkema Inc. (Arkema).

This report describes progress during the reporting period towards fulfilling the requirements of the ACO. A description of the activities anticipated for May and June 2013 is also included.

I. East Plant Activities Completed in May and June

CMS Task IV

The CMS is currently under review by USEPA.

Interim Remedial Measures

Operation of the Halowax groundwater containment system continued. Since pumping began in 2001, 1,143,790 gallons of groundwater have been extracted and treated by the Halowax Area treatment system and approximately 495 gallons of DNAPL have been recovered and properly disposed. A total of 8,310 gallons of groundwater were extracted and treated during the reporting period.

Other Activities

LSS, on behalf of Arkema, is participating in a Great Lakes Legacy Act project to complete an RI/FS in the Trenton Channel. Work on this project is ongoing. A revised FS including an additional remedial alternative will be completed in 2013. It is expected that LSS, GLNPO, and other non-federal parties will execute in 2013 a GLLA Project Agreement to prepare a remedial design.

II. Corrective Action Activities Anticipated for July and August 2013

CMS Task IV

LSS will await EPA approval and/or comments on the CMS.

Interim Remedial Measures

Operation and maintenance of the Halowax groundwater containment system will continue.

Based on the above information, LSS believes that all project activities during the reporting period were in full compliance with the requirements of ACO. If you have any questions or comments regarding this information, please call me at (610) 594-4435.

Sincerely,



Michael Pinto
Principal Environmental Engineer
Legacy Site Services, LLC

cc: Mr. Peter Quackenbush- MDNR - Waste Management Div. Lansing
Mr. Laura Verona- MDNR - Waste Management Div. Livonia